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August 12, 2024

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

**Re: *SecurityScorecard, Inc. v. Safe Securities, Inc.*, Case No.: 1:24-cv-04240-ER**

Dear Judge Ramos:

We write on behalf of Plaintiff SSC<sup>1</sup> to respond briefly to the letter filed by Defendant SAFE (Dkt. 100) regarding SSC's Proposed Order (Dkt. 98). SSC's original request for relief has been partially addressed by the stipulation negotiated by the parties and filed earlier today. (Dkt. 97 ("Stipulation")). The Stipulation still leaves the issue of remediation for the Court to determine – precisely as SSC explained in its August 9, 2024 reply brief. *See* Dkt. 95. That specific remediation relief is now addressed in the Proposed Order. The Proposed Order does not contain a "new argument" (*see* Dkt. 100 at 1); rather, SSC set forth its argument on the issue of remediation fully in its reply brief. *See* Dkt. 95 at 4-5 & n.7, 8 n.10, 10.

SSC is prepared to discuss its Proposed Order at the hearing scheduled for tomorrow.

Respectfully submitted,

/s/ Kenneth W. Taber

Kenneth W. Taber

cc: All Counsel of Record

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<sup>1</sup> Capitalized terms not defined herein have their meaning as in the Complaint, Dkt. 1.